

EXHIBIT 4
(Whitelaw Deposition Transcript)

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

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5
6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 : MDL NO. 2804
10 APPLIES TO ALL CASES :
11 : CASE NO.
12 : 17-MD-2804
13 :
14 :

15 - HIGHLY CONFIDENTIAL -
16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17 VOLUME I

18 - - -

19 May 16, 2019

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21 Videotaped deposition of
22 DR. SETH B. WHITELOW, taken pursuant to
23 notice, was held at the offices of Golkow
24 Litigation Services, One Liberty Place,
25 1650 Market Street, Philadelphia,
26 Pennsylvania beginning at 9:18 a.m., on
27 the above date, before Michelle L. Gray,
28 a Registered Professional Reporter,
29 Certified Shorthand Reporter, Certified
30 Realtime Reporter, and Notary Public.

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32 GOLKOW LITIGATION SERVICES
33 877.370.3377 ph | 917.591.5672 fax
34 deps@golkow.com

1 new developments that are relevant
2 to the work that I've already
3 done, so...

4 BY MR. EPPICH:

5 Q. But these reports express --
6 represent your complete set of opinions
7 in this case; is that true?

8 A. At this moment in time, as
9 you'll notice in my original report, I
10 reserve the right to supplement the
11 report should new and additional
12 information come to light that's relevant
13 to the work that I've done.

14 Q. Do you have any changes to
15 make to either of your reports sitting
16 here today?

17 A. Not that I can think of.

18 Q. You still hold all of the
19 opinions expressed in these reports?

20 A. Yes, sir, I do.

21 Q. In writing your report, did
22 you report -- did you write the first
23 draft of your report?

24 A. Chris, I wrote every draft